

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS
PRODUCTS LIABILITY LITIGATION

) Master Docket No.:
) 2:18-mn-2873-RMG

CITY OF CAMDEN, et al.,

Plaintiffs,

-vs-

BASF CORPORATION, individually and as successor in
interest to Ciba Inc.,

Defendant.

MOTION FOR LEAVE TO FILE MULTI-PLAINTIFF COMPLAINT

INTRODUCTION

Plaintiffs City of Camden, California Water Service Company, City of Benwood, City of Brockton, City of Delray Beach, City of Freeport, City of Sioux Falls, City of South Shore, Coraopolis Water & Sewer Authority, Dalton Farms Water System, Martinsburg Municipal Authority, Township of Verona, and Village of Bridgeport are Public Water Systems, as such term is defined by the EPA, that draw or otherwise collect from any water source that was tested or otherwise analyzed for PFAS and found to contain any PFAS at any level.

Plaintiffs seek to file the attached Complaint to recover damages for the contamination of their drinking water wells and supplies. The named Plaintiffs seek to represent a class of Public Water Systems throughout the United States of America that have one or more water sources found to contain PFAS.

A class is appropriate and necessary here to protect the rights of those Public Water Systems that are faced with PFAS contamination in their water sources.

Plaintiffs seek leave to file this multi-plaintiff action in MDL 2873 pursuant to CMO 3, paragraph 26.

REQUEST FOR LEAVE

Plaintiffs' claims arise out of PFAS contamination in their Public Water Systems' drinking water. They involve the common questions of law and fact that MDL 2873 was established to address in an efficient and comprehensive manner, and Plaintiffs' lawsuit will be transferred to this MDL even if filed in a different federal district court. Because Plaintiffs' lawsuit would be transferred to this Court, the interests of judicial economy are furthered by permitting direct filing into the MDL.

Dated: May 23, 2024

Respectfully submitted,

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Proposed Class Counsel

**CERTIFICATE OF
SERVICE**

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 23rd day of May, 2024 and was thus served electronically upon counsel of record.

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